

Amanda Katzenstein, Esq. (VBN #82273)
POLSINELLI LLP
Three Embarcadero Center, Suite 1350
San Francisco, California 94111
(415) 248-2100

*Counsel for certain Lender Trusts and their
Special Servicer, KeyBank National Association*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:)	Chapter 11
)	
CIRCUIT CITY STORES, INC., et al.,)	Case No. 08-35653-KRH
)	
Debtors.)	Jointly Administered

MOTION FOR ADMISSION *PRO HAC VICE*

Amber Katzenstein of Polsinelli LLP (“**Movant**”) hereby moves this Court, pursuant to Local Bankruptcy Rule 2009-1(E), for an Order authorizing attorney Robert J.E. Edwards of Polsinelli PC to appear *pro hac vice* in the above-referenced bankruptcy cases to represent the entities listed on **Exhibit A**, attached hereto, (the “**Lender Trusts**”) and on behalf of KeyBank National Association (“**Key**”), successor to Capmark Finance Inc., as special servicer for the Lender Trusts. In further support of this motion, Movant states as follows:

1. I am a member in good standing in the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia. I will be associated with Mr. Edwards in this matter. My bar number and business address are as follows:

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2. Robert J.E. Edwards is a member in good standing of the bar of the States of Missouri, Kansas, and New York, and admitted to practice before the U.S. Districts and

Bankruptcy Courts for the Western District of Missouri and the District of Kansas. There are no disciplinary proceedings pending against Mr. Edwards in any jurisdiction in which he is admitted to practice.

3. Mr. Edwards' business address and contact information are as follows:

Robert J.E. Edwards
Polsinelli PC
900 West 48th Place, Suite 900
Kansas City, Missouri 64112
(816) 753-1000
Fax No. (816) 753-1536
redwards@polsinelli.com

4. Mr. Edwards has never been the subject of disciplinary action or denied admission by the bar of any state or federal court.

5. Mr. Edwards has completed an Application to Qualify as a Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2), a copy of which is attached hereto as **Exhibit B**.

6. A proposed Order granting the relief requested in this Motion is attached hereto as **Exhibit C**.

7. Mr. Edwards understands that *pro hac vice* admission does not constitute formal admission to the bar of the United States Bankruptcy Court for the Eastern District of Virginia.

WHEREFORE, Amanda Katzenstein respectfully requests that the Court enter an Order allowing Robert J.E. Edwards to appear *pro hac vice* in the above-referenced cases as counsel for certain Lender Trusts and their Special Servicer, KeyBank National Association, and for such other and further relief as this Court deems just and proper.

Dated: December 9, 2016

Respectfully submitted,

POLSINELLI LLP

By: /s/ Amanda Katzenstein
AMANDA KATZENSTEIN (VBN #82273)
Three Embarcadero Center, Suite 1350
San Francisco, CA 94111
(415) 248-2100
Fax No. (415) 248-2101
akatzenstein@polsinelli.com

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of December 2016, a true and correct copy of the foregoing *Motion for Admission Pro Hac Vice* was filed using the Court's CM/ECF system that sent notice of such filing to counsel for the Debtors, Liquidating Trust, U.S. Trustee, and all interested parties by ECF notification from the Court.

/s/ Amanda Katzenstein